# TES IV WORK ASSIGNMENT #127 RCRA COMPLIANCE EVALUATION INSPECTION

VANDENBERG AIR FORCE BASE CA 9570025149

**MAY 1987** 

03-25-87

# INSPECTION REPORT PREPARED FOR

# U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9 TOXICS AND WASTE MANAGEMENT DIVISION COMPLIANCE AND RESPONSE BRANCH

## RCRA Compliance Evaluation Inspection

Facility: Vandenberg Air Force Base

Lompoc, CA 93436

EPA Identification No.: CA 9570025149

Date of Investigation: March 25, 1987

EPA Inspector: Carole Missirlian

Carl Roner

Jacobs Engineering Group Inc.

Facility Representative: Lt. Col. James Morris

Vandenberg Air Force Base

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#### 1.0 INTRODUCTION

On March 25, 1987, a RCRA Compliance Evaluation Inspection (CEI) was performed for EPA Region IX by Jacobs Engineering Group Inc. (Jacobs) personnel at Vandenberg Air Force Base (VAFB). This work was conducted in partial fulfillment of Technical Enforcement Support (TES) IV Work Assignment #127 for EPA Region IX.

This investigation report consists of: a discussion of the facility's RCRA background; a summary of the facility's reported hazardous waste management practices and review of pertinent facility documents; observations made during the inspection; areas/items that were not inspected during the facility visit due to time constraints and logistics of this work assignment; and a listing of potential violations. This report is supplemented with documentation requested by the investigators during the visit and copies of the following checklists, if applicable:

- o Form A: Interim Status Standards for Facilities that Treat, Store or Dispose of Hazardous Wastes,
- o HSWA Requirements,
- o RCRA F-Solvent Land Restriction, and
- o O and P, Incineration and Thermal Treatment.

Photographic documentation is provided as an attachment.

Additional documents obtained during the course of the inspection are maintained in the Jacobs TES contract file at Jacobs' Pasadena, CA office.

#### 2.0 BACKGROUND AND FACILITY OPERATIONS

VAFB is located near Lompoc, Santa Barbara County, California. The base comprises approximately 98,000 acres, including sixteen miles of coastline. The primary mission of VAFB is to maintain an aerospace center for the launch of space vehicles and the test launching of intercontinental ballistic missiles. The EPA identification number for VAFB is CA 9570025149. A Part A permit application was filed in November 1980. A Part B permit (see Attachment A) was issued on July 24, 1986, by the California Department of Health Services (DHS), under authorization granted by EPA. This permit is valid for a period of 5 years.

The processes at VAFB that produce hazardous wastes are missile maintenance and operations, lubricating oil change, film processing, paint stripping, cleaning, and metal finishing and plating operations. Detailed data on waste generation types and quantities are presented in Attachment B. The generated waste types consist of spent solvents, cyanide wastes, corrosive wastes, certain heavy metals wastes, pesticides, asbestos and water reactive wastes. Hazardous wastes are temporarily stored at several Collection/Accumulation Points (CAP) throughout the Base. The waste is appropriately labelled, including type of waste and date of accumulation. Wastes are stored less than 90 days at the CAPs; the accumulated wastes are picked up once a week and transported to the permitted storage building.

#### 3.0 DOCUMENT REVIEW

The 1986 RCRA CEI report was reviewed prior to visiting the facility. This document included facility background information, potential violations reported during the inspection, Part A permit application and an EPA Region IX inspection report checklist.

An inspection of VAFB was performed on March 25, 1987, by Ms. Carole Missirlian and Mr. Carl Roner from Jacobs. The inspectors met with Lt. Col. James Morris of the Environmental Task Force at VAFB, other members of the Environmental Task Force and Mr. Paul Ortiz, a representative of the Defense Reutilization Marketing Office (DRMO). Jacobs personnel reviewed the documents required under 40 CFR 264 and 265, which were available at the time of the inspection. These documents were the following:

- o Part B permit;
- o Inspection schedule;
- o Operating records;
- Waste manifest records;
- o Operation Plan;
- General waste analysis plan;
- o Closure plan:
- Personnel training records;
- o Biennial report:
- o Contingency plan; and

o Facility map, documenting all hazardous waste TSD areas.

Inspections are performed weekly or when excessive waste movement occurs. The inspections are recorded on preprinted inspection forms. Any observed problem is noted and corrective action taken accordingly (refer to Attachment C). Operating records are recorded on pre-printed forms.

Spent F-solvents (F001 to F005) are generated on site. The wastes are sent for recycling at an off-site facility. The waste manifests include the special requirements for F-solvents, F001-F005 (please see Attachment D). Since the included copy is the one returned to the generator, the certification statement is not shown on this manifest sample.

The waste analysis plan (please see Attachment E), does not include the sampling method and parameters of analysis; it merely states that "the COR shall select the items to be tested by any method he chooses". The Operation Plan was completed in June 1984, but has not been amended to include special handling of the F-solvents, F001 to F005.

An extensive personnel training program is implemented at VAFB, but the training records do not include personnel job titles and job descriptions. All other reviewed documents were adequate. VAFB has taken corrective measures to remediate the potential violations listed in the 1986 RCRA CEI (please refer to Attachment F).

#### 4.0 SITE INSPECTION

Upon the inspectors' arrival at VAFB, a briefing session was held to discuss the objectives of the inspection, the role of the Environmental Task Force and the handling of hazardous materials at the base. The inspectors then proceeded with the site inspection, accompanied by VAFB representatives. Site photographs are included in Attachment G. First, two typical CAPs were inspected at the shuttle launch area and near Building 3000,V19. The CAPs consisted of a fenced and covered concrete pad. Different waste categories (flammable, acid and general) were separated by a 6" x 6" berm. Each bermed area included a closed sump to collect any spill or contaminated water. The contained materials would then be pumped and drummed for proper disposal. Containers were clearly labeled, in good condition, and placed on

wooden pallets (please refer to photograph #1). Both CAPs were equipped with an emergency shower, an eye wash, fire extinguishers, sprinklers and appropriate emergency and spill control equipment (please refer to photograph #2). Accumulated drums are picked up once a week, and transported to the permitted storage facility to assure proper disposal. Any movement of containers is properly documented. The inspected CAPs were operated in compliance with the 40CFR262.

The permitted hazardous facility, Building 3300, was then inspected by Jacobs personnel, accompanied by representatives of the Environmental Task Force, and Mr. Paul Ortiz, representing DRMO. Building 3300 is constructed of reinforced concrete and has a metal roof. All exposed concrete floors and walls have an epoxy coating. The floor plan shows a slope from the sides of the building toward the center.

The facility floor is divided into several contained sections as follows:

- Water Reactive Material,
- PCB Storage,
- Toxic Material,
- Corrosive Material, and
- Flammable Material.

Each of these sections is fenced and identified by a sign indicating the nature of the stored waste.

The following observations are offered, based on the site investigation:

- The portion of the storage facility designated for PCB storage complied with the requirements of 40 CFR 761 (please refer to photograph #3).
- The wastes were handled and stored in containers. The containers were in excellent condition.
- Containers were stored on pallets and placed in the appropriate areas. A
  forklift truck was utilized to transfer the drums to and from transport
  vehicles (please refer to photograph #4).

- Flammables were away from corrosives and toxics, thus minimizing the chance of fire and explosion.
- The storage area had a 12-foot center aisle and approximately 10-foot rows between vertical storage stacks.
- Each storage section in the corrosive and toxic areas had a separate sump to contain leak or spillage.
- The flammable section was separated from the remainder by a 4-foot separation wall to reduce the explosion hazard.
- A total of eight hundred and sixty 55-gallon drums can be stored at the facility.
- Fire extinguishers and an automatic sprinkler system are installed in the facility.
- Eye wash and emergency showers are installed.
- Emergency and spill containment equipment are maintained at Building 3300.
- A contingency plan is maintained at the facility.

The evacuation plan, emergency telephone numbers, and route to hospital are posted at the facility.

Hazardous materials were also stored in the building. These materials were new products, both current and outdated which will be sold for reuse or recovery. Recyclable wastes were identified. Chemical Waste Management, Inc. picks up the waste and transports it to a certified disposal facility or to a recycler.

#### 5.0 AREAS NOT INVESTIGATED

Due to the limited time available to perform the site visit, only the hazardous waste storage area and two CAPs were inspected. The inspection did not include the remaining CAPs.

#### **6.0 POTENTIAL VIOLATIONS**

The EPA checklists, RCRA Inspection, HSWA Requirements and F-solvent are included in Attachments H, I and J, respectively.

## 265.13b - General Facility Standards (Part 265 Subpart B)

The waste analysis plan does not include the parameters of analysis and the testing methods.

## 265.16d

The personnel training records do not include job titles and job descriptions.

## 268.7 - Land Disposal Restrictions (Part 268)

The waste analysis plan has not been updated to include the F-solvent requirements.

## ATTACHMENT A

DESCRIPTION OF FACILITY, PART B PERMIT

#### ATTACHMENT A

\* Hazardoùs Waste Facility Permit

Vandenberg Air Force Base
Defense Reutilization and Marketing Office
New Mexico and 33rd Street
Vandenberg AFB, CA 93437-5000
Santa Barbara County

(CA 9570025149)

## I. DESCRIPTION OF FACILITY

## A. Ownership, Operations, and Location

Vandenberg Air Force Base AFB, hareinafter called the "owner", and Defense Logistics - Agency (DLA), hereinafter called the "operator" have applied to the California State Department of Health Services for a permit authorizing the continued operation of an onsite hazardous waste storage facility located in New Mexico and 33rd Street, Vandenberg Air Force Base, Santa Barbara County, California.

The hazardous waste operation at the facility includes storage of hazardous wastes in approved containers in a secure storage area, prior to transport to a permitted treatment or disposal facility. The facility generates and stores annually approximately 32,000 pounds of spent halogenated solvents, 10,000 pounds of spent non-halogenated solvents, 1,200 pounds of spent cyanide, 2,000 pounds of cadmium wastes, 20,000 pounds of corrosive wastes, 3,000 pounds of pesticides, 5,000 pounds of asbestos, 15,000 pounds of polychlorinated biphenyl wastes, 1,000 pounds of chromium wastes, 500 pounds of arsenic wastes, 500 pounds of lead wastes, 200 pounds of silver wastes, and 3,000 pounds of water reactive wastes. A complete list of the hazardous wastes stored at the facility is in the approved operation plan. These wastes are produced at the facility from the following processes: missile maintenance and operations, lubricating oil change, film processing, paint stripping, cleaning, and metal finishing and plating operations. The storage area has separate compartments for the storage of the flammables and combustibles, acids, caustics, toxics, reactives, oxidizers, and polychlorinated biphenyl wastes. The maximum capacity of the storage area is 832 55gallon drums.

The California State Department of Health Services (herein after referred to as "the Department") has jurisdiction over this hazardous waste storage facility and is issuing this permit subject to the terms and conditions contained herein.

## B. Compliance with the California Environmental Quality Act

The Department is issuing this Hazardous Waste Facility Permit for the continued operation of an existing facility, with only minor alterations and as such is exempt from the provisions of the California Environmental Quality Act in accordance with Section 15301, Chapter 3, Title 14, California Administrative Code.

#### II. GENERAL CONDITIONS

## A. References and Terminology

All parts in this permit are identified by Roman numerals. The items set forth in each part shall apply to the owner, operator, and/or facility in addition to the items set forth in any preceding and/or following part of this permit. Unless explicitly stated otherwise, all cross-references to items in this permit shall refer only to items occurring within the same part.

## B. Effect of Permit

The owner or operator is permitted to store hazardous wastes in accordance with the conditions of this permit. Any storage of hazardous wastes not authorized in this permit is prohibited. Compliance with this permit constitutes compliance for purposes of enforcement with the provisions of the California Health and Safety (H&S) Code, in regards to the facility permit requirements including Chapter 6.5, Division 20, and with the minimum Standards for Management of Hazardous and Extremely Hazardous Wastes (Chapter 30, Division 4, Title 22, CAC). Issuance of this permit does not convey property rights of any sort or any exclusive privilege, nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of federal, state, or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment for any imminent and substantial endangerment to human health or the environment.

#### C. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause as specified in Sections 66382, 66383, and 66385, Title 22, California Administrative Code (CAC). A new facility permit condition or a modification of an existing facility permit condition shall become effective on the date that written notice of such change is received by the owner or operator. The filing of a request for a request for a permit modification, revocation, and reissuance, or termination or the modification of planned changes or anticipated noncompliance on any part of the owner or operator does not stay the applicability or enforceability of any permit condition.

## ATTACHMENT B

HAZARDOUS WASTES STORED AND HANDLED AT VAFB

TABLE 1. HAZARDOUS WASTE STORED AT VAFB

Waste Type	Estimated Annual Quantity (pounds)
Spent Halogenated Solvents	32,000
Spent Non-Halogenated Solvents	10,000
Spent Cyanide	12,000
Cadmium Wastes	2,000
Corrosive Wastes	20,000
Pesticides	3,000
Asbestos	5,000
PCB Wastes	15,000
Chromium Wastes	1,000
Arsenic Wastes	500
Lead Wastes	500
Silver Wastes	200
Water Reactive Wastes	3,000

TABLE 2. HAZARDOUS WASTE GENERATED AT VAFB

EPA Waste Number	Contaminants/Substance	EPA Waste Number	Contaminants/Substance
D001	Ignitable	U019	Benzene
D002	Corrosive	U045	Chloromethane
D006	Cadmium	U075	Dichlorodifluromethane
D007	Chromium	U080	
	3/12 3/1/12 4/1	0000	Dichloromethane (methylene chloride)
D008	Lead	U122	Formaldehyde
D009	Mercury solution	U133	Hydrazine
D010	Selenium	U140	Isobutyl alcohol
D011	Silver	U151	Mercury
F001	Halogenated solvents	U154	Methanol
F002	Halogenated solvents	U159	Methyl ethyl ketone
F003	Non-halogenated solvents	U160	Methyl ethyl ketone,
	<b>3</b>		peroxide
F004	Creosols	U165	Naphthalene
F005	Non-halogenated solvents	U174	N-Nitrosodiethylamine
F011	Cyanide solutions	U188	Phenols
P030	Cyanides	U208	1,1,1,2-Tetrachloroethane
P064	Isocyanates	U210	Tetrachloroethylene
P068	Hydrazine, methyl	U220	Toluene
P078	Nitrogen dioxide	U223	Toluene diisocyanate
P080	Nitrogen tetroxide	U226	1,1,1-Trichloroethane
P082	N-Nitrosodimethylamine	U228	Trichloroethylene
	•		Trichloroethene
U002	Acetone	U239	Xylene
U012	Anilines		.,,20.70

ATTACHMENT C

INSPECTION REPORTS SAMPLE

Sample with Discrepancies

	7			<u>,                                     </u>	DISCREPANCIO			
	PECTIC					*LEGEND MA - Not a	aplicable NI – If not inspected	
DATE 6930 AREA/BLDG (Specify when HM/HW is stored off-site of DPDO) SIGN						SIGNATURE OF		
10-70-86 3300 HM/H	W		- K	aloke	1 Com	1 / Land		
HAZARDOUS PROPERTY STORAGE FACILITIES (Weekly) (Daily when loading/unloading)	SAT	UNSAT	1	NI	LOCATION AND PROBLEMS	OBSERVED	DATE CORRECTIVE	
Security of Doors	V						ACTION TAKEN	
Security of Windows			W	1				
Security of Gates	/					74		
Security of Fences/Warning Signs	V							
Evidence of Leaks (Drums/ Containers)	/					·		
Evidence of Tampering						·		
Evidence of Damage						<del></del>		
Temperature Control			**** - * ****	l-,				
Drainage and Spill Containment								
Water Pressure/Volume		/			Called CES 10	10 5-1	Blead water Line	
Sprinkler Systems (Flammables)	•		1		Care CES 10	10-16	10-16-86	
"No Smoking" Signs			** *-					
Other - Deterioration of Concrete		<u>-</u>						
Other ExiT. Light					Work arom # F9	12.0	Part on ORDER	
Other					0000 C101- 17 /			
PERSONAL PROTECTIVE EQPT/SPILL SUPPLIES (Weckly)								
Eye Wash Operation	•	/	3年夏/李茂·		Low water Pre	som	Conrect 10-16-86	
Alarm Operation	V				70 -0 -0 -0 -0 -0 -0 -0 -0 -0 -0 -0 -0 -0		C 100 0 10 10 00	
Communication System Operation								

Continued on raware side

PERSONAL PROTECTIVE EQPT/SPILL SUPPLIES  CON'T (Weekly)	SAT	UNSAT	NA .	NI	LOCATION AND PROBLEMS OBSERVED	DATE CORRECTIVE
Fire Extinguishers	V		/			ACTION TAKEN
MHE Operable/Safe for HM/HW	1			<del> </del>		
Absorbents Available	1					
Eye Shields Available/in use	V		<del></del> -			
Emergency Clothing Available	V			<del> </del>		
Deluge Shower Operation		V		<u> </u>		
Other ·			<del>_</del>			
Other				ļ <u>.</u> .		
HAZARDOUS MATERIAL AND/OR WASTES (Weekly)						
Leaks/Spills Detected or Observed				3.30 (0.00)		
Odors/Fumes Detected or Observed						
Evidence of Tampering/Damage						
Evidence Property Stolen or Missing -	V					
Other - Deterioration of Drums	A		· ·			
Other						
Other				<b>∤</b>		
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Sample No Discrepancies.

	SPECTIO		*LEGEND - NA Not applicable NE - If not inspect					
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HAZARDOUS PROPERTY STORAGE FACILITIES (Weekly) (Daily when loading/unloading)	SAT	UNSAT	NA	NI	LOCATION AND PROBLE		DATE CORRECTIVE	
Security of Doors	2						ACTION/TAKEN	
Security of Windows			/					
Security of Gates	1							
Security of Fences/Warning Signs	i	<del> </del> -						
Evidence of Leaks (Drums/ Containers)	1							
Evidence of Tampering	1		· ·					
Evidence of Damage			·					
Temperature Control								
Drainage and Spill Containment	7	- <b></b> ,						
Water Pressure/Volume	V	/··		- <del></del>				
Sprinkler Systems (Flammables)				·,- ·				
"No Smoking" Signs				<del></del>				
Other - Deterioration of Concrete								
Other								
Other						•		
PERSONAL PROTECTIVE EOPT/SPILL SUPPLIES (Weekly)								
Eye Wash Operation	V			26 8 E				
Alarm Operation	1/							
Communication System Operation	1							

PERSONAL PROTECTIVE EQPT/SPILL SUPPLIES CON'T (Weekly)	SAT	UNSAT	NA	NI	LOCATION AND PROBLEMS OBSERVED	DATE CORRECTIVE ACTION TAKEN
Fire Extinguishers	V		,			NOTON PAREN
MHE Operable/Safe for HM/HW						
Absorbents Available	V					
Eve Shields Available/in use	1					
Emergency Clothing Available	1					
Deluge Shower Operation						
Other						
Ortiga				•		
HAZARDOUS MATERIAL AND/OR WASTES (Weekly)				· · · · · · · · · · · · · · · · · · ·		
Lnaks/Spills Detected or Observed						
Orders/Fumes Detected or Observed	1					
E. dence of Tampering/Damage						
Evidence Property Stolen or Missing	~	····		,		
Other - Deterioration of Drums	1					
Other						
Other ·						. 44.
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ATTACHMENT D

WASTE MANIFEST SAMPLE

Sta	ite of California - Nealth and Welfare Agency	~^1	EXIS	9-30	-BATONIA	partment of Substances (	Health Services Control Division tento, California
P	ease print of type. (Form designed for use on eilte (12-pitch) typewriter		- /	, -		Sacram	ento, California
	UNIFORM HAZARDOUS 1. Generator's US		fanifest ument No	2. Page	is not	ion in the si required	naded areas by Federal
	DR MD VAFB	801 399 7			I law.		daji
	4. VARIANTER G, A FB, (A 93437	805 BLG 9	431				
	5. Transporter 1 Company Name 6.	US EPA ID Nur	nber		nor, i s		NY Pas
	7. Transporter 2 Company Name 8.	US EPA ID Nun					
	Designated Facility Name and Site Address     Bayday Chemical	US EPA ID Nun	nber				
	2096-B Walsh Av. Santa Clara, CA 95050 C.		262				
		AT080012	40.0		13.	14.	
a	11. US DOT Description (Including Proper Shipping Name, Hazard		No.	Туре	Total Quantity	Unit Wt/Vol	
N	ORM-E FOOZ) NA9	10 1005					
R	ORM-E FOOZ) NA"9	<i>189</i>	0/18	DM/	Ø490	P	
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	d.						
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•							
	15. Special Handling Instructions and Additional Information					and the same of	
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	00-01-1:	$\sim$	^	^			
	PPE Clothing	Keau	اروغ	)			
	<ol> <li>GENERATOR'S CERTIFICATION: I hereby declare that the contabove by proper shipping name and are classified, packed, ma</li> </ol>	rked and labeled and a	re in ali ree	nacte in n	roner conditi	ed on	
	ioi transport by nighway according to applicable internation	nal and national gover	nmental re	gulations	•	Γ	Date
V	Printed/Typed Name	Signature	1			Mont	th Day Year
Ţ	17. Transporter 1 Acknowledgement of Receipt of Materials	1/1/1	1				Date Date
R A N S	Printed Typed Name	Signature	1.	<u> </u>		Mont	h Day Year
8	18. Transporter 2 Acknowledgement of Receipt of Materials		-46	ham		7/-	Date /
R T E	Printed/Typed Name	Signature				Mont	h Day Year
H	19. Discrepancy Indication Space			···-··································			1.1.
F	,,						
ĉ	·						
	<ol> <li>Facility Owner or Operator: Certification of receipt of hazardo item 19.</li> </ol>	ous materials covered t	y this man	lfest exce	pt as noted	in	
Ť	Pripted/Typed Name	Signature	7			Mont	Date h Day Year
	Thomas F. Taylor	1 Min	مسد سرم	May 1	1/4/	ァ 1カ*	31/31/2/2
(EP/	8022 A (4404) YELLOW TSDF SENDS THIS C 8700-22)	OPY TO GENERATOR	R WITHIN	30 DAYS		11.4	84 89641
7							

ATTACHMENT E

WASTE ANALYSIS PLAN

## Waste Analysis Standard Operating Procedures

The purpose of waste analysis is to verify that a generator's identification of hazardous waste is correct.

## CLASSIFICATION OF HAZARDOUS WASTES

Hazardous wastes are divided into Group I and Group II wastes.

- 1) Group I wastes are those wastes for which no laboratory analysis is required. This includes wastes in unopened, original manufacturer's containers, plus paints and reagent grade chemicals in previously opened, original containers. If inspection determines that all containers have their original labels and have not been opened, the shipment will be accepted as Group I wastes. If the shipment is paint and reagent grade chemicals in opened containers, each container will be inspected to ensure that there are no separated phases or settled solids in the paint, or that other wastes have been mixed in. If not, these items will also be considered Group I wastes.
- 2) Group II wastes are those hazardous wastes which are not included in Group I. Examples are used solvents with EPA designated hazardous waste numbers FO\_\_\_\_, listed in 40 CFR 261.31, e.g., used trichloroethylene F002.

## SAMPLING

## FREQUENCY

- 1) For off-site turn-in activities transferring property to DRMO once or more per month, sampling will be performed once per month.
- 2) For off-site turn-in activities transferring property to the DRMO less than once per month, sampling will be performed at each turn-in.

## NUMBER OF SAMPLES

1) Initially, schedule A of enclosure 1 shall be used to determine the number of samples. If the analysis of these samples agrees with the generator's identification for three consecutive samplings, then sampling can be conducted in accordance with schedule B of enclosure 1. Schedule B can continue to be used until test analysis results for a shipment do not verify the generator's identification. If such a discrepancy is found, schedule A will be used again until three consecutive samplings occur without disagreement between test results and the generator's identification.



Encl 3 PAGE 2

SUBJECT: Waste Analysis Standard Operating Procedures

## COR'S DUTIES

1) Requesting sampling services: The DRMO (COR) sends a work order request for sampling and testing to the contracting officer. This request identifies the following information:

- a) Contract number (of the sampling requirements contracts).
- b) Point of contact and telephone number.
- c) Contract line item number.
- d) Location of containers/drums (as shown in contract).
- e) Number of samples per location.
- f) Other pertinent comments.
- 2) Selecting the items to be sampled:
- a) A shipment is all Group II hazardous wastes (drums) received from a generator in one day.
- b) Once the number of samples to be taken from a shipment has been determined, the COR shall select the items to be tested by any method he chooses.
- 3) The COR escorts the contractor while samples are being taken.

## IDENTIFICATION OF SHIPMENTS AND SAMPLES

Marking requirements: in order to identify shipments and samples, the DTID number and a container number will be used. The DRMO shall stencil, or otherwise permanently mark, the DTID number on each container in a shipment. In addition, each container will be marked with a unique number as follows: 1 of x, 2 of x, 3 of x, and so on, where "x" is the total number of containers in a shipment.

## PROCESSING THE TEST RESULTS

The DRMO will compare results from sample analyses to the generator's identification of the hazardous waste.

- a) If the results for all items tested agree with the generator's identification, continue processing of the shipment.
- b) If results for any item tested disagree with the generator's identification, the shipment will be rejected, except for those items whose identity was verified as correct. In addition to the rejection standard procedures, the commander of the turn-in activity will be notified by letter of the actions needed to correct the situation.

Encl 3 PAGE 3

SUBJECT: Waste Analysis Standard Operating Procedures

## RECORDKEEPING

Analytical results shall be maintained in the waste analysis record section of the operating log. Enclosure 2 identifies entries in the waste analysis log.

Date:	
Revision No.:	
Section C	
DRMO	

## Table C-4

## Number of Samples to be Collected as a Function of the Number of Items in the Shipment

## Schedule A

Shipment Size	Number of Samples to be Taken
2 to 8	2
9 to 15	3
16 to 25	5
26 to 50	. 8
51 to 90	13 -
91 to 150	. 20
	•

## Schedule B

Shipment Size	Number of Samples to be Taken
2 to 8	1
9 to 15	2
16 to 25	2
26 to 50	3
51 to 90	5
91 to 150	. 8



## ITEMS TO BE INCLUDED IN WASTE ANALYSIS RECORD FORM

- 1. Shipment number (a serial number).
- 2. DTID numbers of a shipment; there can be more than one per shipment.
- 3. Drum number of items samples.
- 4. Total number of drums in shipment.
- 5. Date items sampled.
- 6. Date results received.
- 7. Contents of shipment confirmed.
- 8. Contract number.

**** <u>***</u>	Test	Test Result	Reference
	рH	< 2, > 12.5	A corrosive, e.g., H <sub>2</sub> SO <sub>4</sub> battery acid.
**************************************	Flash Point	< 140	F003, F005, and ignitable waste, e.g., acetone, MEK, or D001.
	Halogens .	уeз	Halogenated, chlorinated solvents, e.g., Trichloroethane, methylene chloride.
		no	Nonchlorinated solvents, e.g., MEK.
Annual control of the	Specific Gravity	< 1	POL product.
. v.		= 1	Water.
Good Processor		` <b>&gt;</b> 1	Chlorinated solvents, e.g., carbon tetrachloride.
Webserver Australia (1994)	Reactivity		-
	Water	reacts	Reactive.
	Cyanides	no .	Not reactive.
Section 2015		yes	Reactive.
* 1/g	Sulfides	no	Not reactive.
		yes	Reactive.
	Physical state layering.	Does not match description	Tells whether it is as stated.
	Color	Color	Match or doesn't match.



**ATTACHMENT F** 

CORRECTIVE MEASURES

#### DEPARTMENT OF THE AIR FORCE



## HEADQUARTERS IST STRATEGIC AEROSPACE DIVISION (SAC) VANDENBERG AIR FORCE BASE. CALIFORNIA 93437-5000

Mr Philip L. Bobel
United States Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco CA 94105-2306

Dear Mr Bobel

Reference EPA letter dated 27 Feb 87, subject, 25 June 86 inspection by Jacobs Engineering.

Reference Jacobs Engineering, 27 Jan 87, RCRA compliance Evaluation Inspection Report, page 7, para 6.0, Potential Violations. All actions have been completed as indicated:

- Required Equipment 265.32a. Facility has adequate water pressure and volume.
- Contingency Plan 265.52d. Plan has been updated to reflect emergency equipment (see attachment 1).
- Operation during interim status 270.71a. Final permit granted November 1986. Attachment 2 is updated hazardous waste list.
- Operation during interim status 270.71a.3. Final permit granted November 1986. Attachment 2 is updated estimated annual qualities.

If you have any questions, please contact Lt Col Jim Morris, 1 STRAD/ETM, (805)866-5725

Sincerely,

KENNETH R. KOLTHOFF, Colonel, USAF Deputy Dir, Environmental Task Force

Kennell 11 Lollhoff

2 Atchs

1. Equipment Plan

2. H.W. List/Volumne

cc: DOHS, Los Angeles



#### DEPARTMENT OF THE AIR FORCE



HEADQUARTERS 1ST STRATEGIC AEROSPACE DIVISION (SAC)
VANDENBERG AIR FORCE BASE, CALIFORNIA 93497-5000

REPLY TO ATTN OF

ET

20 MAR 1987

SUBJECT

Correction to Contingency Plan To Facility 3300

#### TO See Distribution

- 1. A review of the Contingency Plan To Facility 3300 revealed two minor corrections are required.
- 2. Make the following changes as indicated:
  - a. Page number 5, para 11, change OPLAN 236-84 to OPLAN 8550S-86.
- b. Remove old attachment 1, Evacuation Plan and attach new Evacuation Plan, dated 20 March 1987.

KENNETH R. KOLTHOFF, Colonel, USAF

Deputy Director, Environmental Task Force

Distribution 1 STRAD/SE

/PA

USAF HOSP/SG

/SGPB

4392 AEROSG/CC

/RM

/LGT

/LGC

/DE

/DEF

/DEE

/DEM

/DW

SAMTO/CC

6595 STG

WSMC/CC

SD/DEC

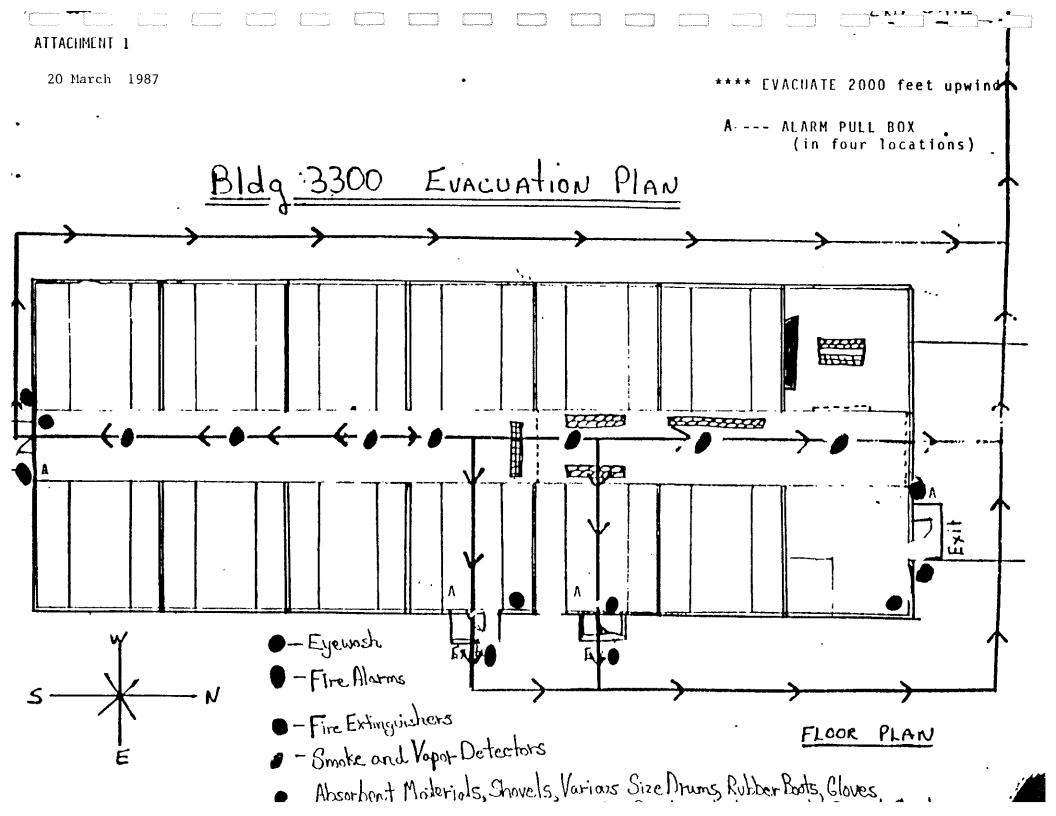
DRMO/SYT

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Bldg 3300 Evacuation Plan

UNITED STATES AIR FORCE





EPA HAZARDOUS WASTE CODE	TYPE BY NAME	MONTHLY	YEARLY	PROCESS THAT PRODUCED WASTE	CONTAINER	CALIF WASTE CODE	HAZARD PROPERTY
D001 - Ignitables 40 CFR 261.21, & 40 CFR 261 Subpart D). (Title 22, Article 9,11) May also contain small percentages of waste code numbers D002, D003, F003, F005, K049, and U159	Flammable liquids & solids such as, IPA paint wastes, petroleum wastes, thinners, adhesives, solvents, and misc. flammables, etc.	100 Drums 50,000 lbs	1,200 Drums 600,000 lbs	Protective coating, cleaning operation, vehicle maint.	DOT Spec. containers	Varies	Ignitable combustible poison
D002 - Corrosives - Acid Bases (40 CFR 261.22, & 40 CFR 261 Subpart D) (Title 22, Article 9,11) May also contain small percentages of waste code numbers D003, & U103	Corrosive liquids & solids such as, Hydrochloric, nitric, acetic, sulfuric, sodium hydroxide, potassium hydroxide & misc. corrosive & bases, etc.	24 Drums 12,000 lbs	288 Drums 144,000 lbs	Cleaning operations Shelf-life expired items.	DOT Spec.	Varies	Corrosive Oxidizer
D003 - Reactives (40 CFR 261.23 & 40 CFR 261 Subpart D). (Title 22, Article 9,11)	Reactive liquids & solids such as, Organic peroxide, potassium nitrate, misc. solvents & misc. reactives etc.	2 Drums 1,167 lbs	24 Drums 14,000 lbs	Aerospace operations and maintenance	DOT Spec.	Varies	Reactive Toxic

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EPA HAZARDOUS WASTE CODE	TYPE BY NAME	MONTHLY	YEARLY	PROCESS THAT PRODUCED WASTE	CONTAINER	CALIF WASTE CODE	HAZARO PROPERTY
D004 thru D017 EP Toxic Waste (40 CFR 261.24, & 40 CFR 261 Subpart D) (Title 22, Article 9,11) May also contain small percentages of F002 wastes.	Misc. EP Toxic Wastes such as, Arsenic compounds, mercury compounds, cadium chromium, lead, lindane contaminated wastes, silver, mercury, selenium.	31 Drums 13,100 1bs	377 Drums 157,100 lbs	Missle Operations and Maintenance. Metal finishing.	DOT Spec. container	Varies	EP Toxic Poison
F001 - Halogenated Solvents (40 CFR 261.31 & 40 CFR Subpart D). May also contain small percentages of F002, U080 & U228 wastes	Spent Halogenated Solvents such as, Trichloroethylene, methylene chloride, trichloroethane, carbon tetrachloride and chlorinated fluorocarbons.	25 Drums 12,500 lbs	300 Drums 150,000 lbs	Degreasing operations	Drums	Varies	Toxic Paison
F002 - Halogenated Solvents (40 CFR 261.31 & 40 CFR Subpart D) May also contain small percentages of F024, K030, U075 and U227 wastes.	Spent Halogenated Solvents such as, Chlorobenzene, trichlorofluoromethane, ortho-dichlorobenzene, dichloromethane.	12 Drums 5,670 lbs	138 Drums 69,000 lbs	Degreasing operations	Drums	Varies	Toxic Explosive Irritating

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EPA HAZARDOUS WASTE CODE	TYPE BY NAME	MONTHLY	YEARLY	PROCESS THAT PRODUCED WASTE	CONTAINER	CALIF WASTE CODE	HAZARD PROPERTY
F003 - Halogenated Solvents (40 CFR 261.31 & 40 CFR Subpart D).	Spent Non-Halogenated Solvents such as, Xylene, Acetone, MIK, ethyle acetate, ethyle either n-butyl alcohol and methanol.	1 Drum 450 lbs	12 Drums 5,000 lbs	Degreasing operations	Drums	271, 331	Ignitable poison
F004 - Non Halogenated Solvents (40 CFR 261.31, & 40 CFR Subpart D).	Spent Non-Halogenated Solvents such as, Cresols and cresylic acids and nitrobenzene.	1 Drum 450 lbs	12 Drums 5,000 lbs	Vehicle maintenance	Drums	Varies	Toxic
F005 - Non-Halogenated Solvents (40 CFR 261.31 & 40 CFR 261 Subpart D)	Spent Non-Halogenated Solvents such as, Toluene, MEK, carbon disulfide, Isobutanol and pyridine.	3 Drums 1,250 lbs	36 Drums 15,000 lbs	Cleaning & paint stripping Operations	Drums	Varies	Toxic Ignitable
F006 - (40 CFR 261.31) May also contain small percentages of U032 waste.	Wastewater treatment sludges from electro- plating operations. Excep- tions in (40 CFR 261.31).	1 Drum 450 lbs	12 Drums 5,000 lbs	Electroplating operations	Drums	Varies	Toxic Poison

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EPA HAZARDOUS WASTE CODE	TYPE BY NAME	MONTHLY	YEARLY	PROCESS THAT PRODUCED WASTE	CONTAINER	CALIF WASTE CODE	HAZARD PROPERTY
F007 - (40 CFR 261.31) May also be F010 and contain small per- centage of P030 waste.	Spent cyanides plating bath solutions from electroplating operations.	1 Drum 450 lbs	12 Drums 5,000 lbs	Electroplating operations.	Drums	Varies	Reactive Toxic Poison
F008 - (40 CFR 261.31) May also contain small percentages of U002 waste.	Plating bath sludges from the bottom of plating baths.	1 Drum 450 lbs	12 Drums 5,000 lbs	Electroplating operations.	Drums	Varies	Reactive Toxic Flammable
P - Listed Wastes Acute Hazardous Waste (40 CFR 261.33(e).	Calcium cyanide, sodium cyanide, hydrogen cyanide, silver cyanide, and misc. acute hazards waste.	3 Drums 1,250 lbs	36 Drums 15,000 lbs	Cleaning operations shelf life expired metal finishing	Drums	Varies	Reactive Toxic Poison

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EPA HAZARDOUS WASTE CODE	TYPE BY NAME	MONTHLY	YEARLY	PROCESS THAT PRODUCED WASTE	CONTAINER	CALIF WASTE CODE	HAZARD PROPERTY
U - Listed Wastes Toxics (40 CFR 261.33(f).	Aniline, Thiourea, Toluene diisocyanate, formaldehyde, and misc. toxic wastes.	52 Drums 25,900 lbs	620 Drums 310,000 lbs	Cleaning operations shelf life expired	Drums	Varies	Toxic Flammable Corrosive Poison
Photography Wastes	Developers, toners, bleaches, fixers, hardners, and misc. photography wastes.	1 Drum 450 lbs	12 Drums 5,000 lbs	F1lm processing	Drums	541	Corrosive Flammable
None	Asbestos	807 lbs 2 Drums	9,681 lbs 20 Drums	Bldg demolition	Double bags, drums	151	Poison Toxic
None	PCBs	12,718 lbs 26 Drums	152,615 lbs 305 Drums	: Change electrical equipment	Drums carcess	261	Poison Toxic
None	Waste ofl	2,576 lbs 52 Drums	309,223 lbs 618 Drums	Waste motor oil	Drums	221	Flammable Liquid
None	Hydraulic fluid	2100 lbs 5 Drums	25209 los 50 Drums	Maintenance activities	Drums	221, 222, 223	Toxic

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EPA HAZARDOUS WASTE CODE	TYPE BY NAME	MONTHLY	YEARLY	PROCESS THAT PRODUCED WASTE	CONTAINER	CALIF WASTE CODE	HAZARO PROPERTY
None	Antifreeze	2 drums 94 gal	24 drums 1,132 gal (1987)	Maintenance activities	Drums	343	Toxic
J087, U240	Pesticides- Diazinon, Mulathion, Lindane, and misc.	l drum 450 lbs	12 drums 5,000 lbs	Entomology	Drums	231, 323	Tox1c
002	Batteries- Lead acid, zinc-akali silver-zinc, alkaline magnesium and nickel	12 drums 5,745 lbs	138 drums 68,920 lbs (1987)	Vehicle maintenance Missile maintenance		112	Corrosiv
001, D002, D003	Empty containers one gallon or larger with less than one inch previously contaminated with hazardous material.	6 drums 3,128 lbs	75 drums 37,532 lbs	; Vehicle maintenance Misslé maintenance	Drums	512, 513	
ill Residues CRC Waste ntaminated)	Misc. spill residues from clean-up, contaminated pallets.	l drum 450 lbs	12 drums 5,000 lbs	CAP's Hazards Waste Handling & Clean-up Operations	Drums Pallets	Varies	

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#### ATTACHMENT G

SITE PHOTOGRAPHS

Date:

March 25, 1987

Photographer:

Carole Missirlian

Facility Representative:

Lt. Col. James Morris



Photograph #1: Drum storage at Space Shuttle Launch Area CAP, VAFB.



Photograph #2: CAP at V19, Building 3000, VAFB.



Photograph #3: PCB Storage Area, Hazardous Waste Storage Building 3000, VAFB.



Photograph #4: Hazardous Waste Storage Building 3000, VAFB.

ATTACHMENT H

EPA RCRA INSPECTION CHECKLIST

# Inspection Report U.S. Environmental Protection Agency Region 9 Toxics and Waste Management Division Field Operations Branch

Purpose: Determine RCRA Comphance

Facility Name: Vanderbog Air Force Base (VAFB)

Street:

City: Compoc State: California Zip Code: 93437

EPA ID number: CA 95 7 00 25 14 9

Report Number:

Date of Investigation: 3/25/87

EPA Inspector(s): Carole Missirlian

Carl Roner Jacobs Engineering

State Inspector(s):

Facility Representative(s): Lt Col. James Horris

Report Prepared By: Carole Missi-ham

# Form A - Interim Status Standards for Facilities that Treat, Store or Dispose of Hazardous Waste

I.	General	Information:

(A)	Operator: Department of ?	De fenge	- ,	
	Street: P. O. 3 = × 5125 D	RNO		
	City: Vanderberg AFB State:	CA Zip	Code: 93437	
(B)	Owner: Department of Dep	lense (	1392 AEROS	SG/CC
	Street:			
	City: Vander burg AFB State:	CA Zip	Code: 93437	
(C)	Site Activity:	•		
X	Generation: Complete Form B	Small	1 Quantity Generat	OE:
<del></del>	Transportation: Complete Form C		cler: Complete For	m B
/	Storage:	Disp	osal:	
×	Container (SO1)	Inje	ction Well (D79)	
	Tank (SC2)	Land	fill (D80)	
_	Waste Pile (SO3)	Land	Application (D81)	
	Circles Transfer (COA)			
	Surface Impoundment (SO4)	Ocea	n Disposal (D82)	
	perrace informent (204)		n Disposal (D82) ace Impoundment (D	B3)
		Surf	ace Impoundment (D	
	Treatment: Proc	Surf	ace Impoundment (D	
	Treatment: Proc	Surf	ace Impoundment (D	

#### I. General Information: - Continued

(D)	Nature Of Business:
	The primary mission is the lamph of space vehicles and operation of test lambing of missiles, a intercontinental ballistic missiles.
	and operation of test Counching of misorles, 2
	inter-continental ballistic missiles.
(E)	Description Of Facility Processes:
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#### I. General Information: - Continued

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# II. Interim Status: (Part 270 Subpart G)

1		Yes	No	Comments
. (2	A) Qualifying For Interim Status:			Although a Part B permit
	For the existing facility to be treated as having been issued a permit, the facility must have:			than been issued by DOHS, CA, the facility is still operating
	a. Submitted a notification of H.W. activity (270.70a.1)?			under federal interin
***	b. Submitted Part A of the permit application (270.70a.2)?			
], ·	c. Achieved compliance with RCRA interim status standards (270.70b)?			
(B	Operating During Interim Status:		•	
1.	Has the facility complied with the following restrictions:			
erin San Americani	Has only treated, stored or disposed of H.W. specified in the Part A (270.71a.1)?			
b	. Has only employed processes specified in the Part A (270.71a.2)?			
C	. Has not exceeded design capacities specified in the Part A (270.71a.3)?			
)(C)	Changes During Interim Status:		· •	
1.	Has a revised Part A been submitted prior to the following changes:	•		•
<b>a</b> .	T/S/D of H.W. not previously ident- ified in the Part A (270.72a)?	<del></del> .		•
<b>b.</b>	Increases in design capacity of processes (270.72b)?	·		
C.	Changes in or additions to pro- cesses (270.72c)?	······································	<del></del>	
d.	Change in ownership (270.72d)?			
6.	Have the changes made not amounted to reconstruction (270.72e)?	<del></del> -	<u> </u>	

# III. General Facility Standards: (Part 265 Subpart B)

		Yes	No_	Comments
(A)	Required Notices:			,
1.	Has the RA been notified regarding the receipt of H.W. from a foreign source (265.12a)?			N/A
2.	Before transferring ownership, has the facility notified the new owners in writing of the requirements of Parts 265 and 122 (265.12b)?			M/A
(B)	General Waste Analysis:			•
1.	Has the facility obtained a detailed chemical and physical analysis of each H.W. (265.13a.1)?	<u>×</u> .		
2.	Does the analysis contain all information that must be known to properly treat, store or dispose of the H.W. (265.13a.1)?	χ_	-	including requirements for F- solvents F001 - F005
3.	Does the facility have records documenting the required H.W. analysis, e.g., lab reports, published data, generator supplied data (265.13a.2)?	X		F-solvants Fool-Foo5
4.	Has the analysis been repeated to ensure that it is accurate and up-to-date (265.13a.3)?	×		
5.	Is the analysis repeated when there is a change in the process (265.13a.3)?	X		
6.	For off-site facilities, is the analysis repeated when the H.W. received does not match the H.W. designated on the manifest (265.13a.3)?			NA
7.	For off-site facilities, does the facility inspect or analyze each movement of H.W. to verify that the H.W. received matches the identity of the H.W. specified on the manifest (265.13a.4)?			V/A

# III. General Facility Standards: - Continued (Part 265 Subpart B)

		Yes	<u>No</u>	Comments
8.	Does the facility have a detailed waste analysis plan (265.13b)?	<u>/</u>		,
9.	Does the facility follow the procedures specified in the waste analysis plan (265.13b)?	<u>/</u>		
10.	Does the waste analysis plan contain the following elements:			
a.	Parameters of analysis of each H.W. handled (265.13b.1)?		X	·
b.	Rationale for the selection of each parameter (265.13b.2)?		<u>. X</u>	,
c.	Test methods used to obtain a representative sample of H.W. (265.13b.3)?		X	•
<b>d.</b>	Frequency which each analysis will be repeated (265.13b.4)?	X		
e.	For off-site facilities, the analysis that generators have agreed to supply (265.13b.5)?			N/A
11.	For off-site facilities, does the plan specify procedures for inspection or analysis of each movement of H.W. (265.13c)?		· :	N/A
12.	For off-site facilities, does the plan contain the following elements:	•		·
a.	Description of procedures used to identify each movement of H.W. (265.13c.1)?	•	_	MIA
b.	Description of the sampling method used to obtain a representative sample of the H.W. (265.13c.2)?			NIA
(C)	Security:			
1. [	Oo security measures include:	,		
a.	24-hour surveillance (265.14b.1)?			

# III. General Facility Standards: - Continued (Part 265 Subpart B)

		Yes	<u>No</u>	Comments
b.	Artificial or natural barriers and controlled entry (265.14b.2)?	1/		Around Pour HLA Bldg
C.	Signs with the legend "Danger- Unauthorized Personnel Keep Out" posted at entrances to active portions of facility (265.14c)?	<u>/</u>		and CAPs
(D)	General Inspection Requirements:			
1.	Does the facility inspect for equipment malfunctions and deterioration, operator errors, and H.W. discharges (265.15a)?	<u> </u>	<del>-</del>	3
2.	Does the facility follow a written inspection schedule (265.15b.1)?	<u>/</u>		
3.	Is the schedule kept at this facility (265.15b.2)?	<u> </u>		
4.	Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: (265.15b.	,		
a.	monitoring equipment?	V		<u> </u>
b.	safety, emergency equipment?	V		
c.	security equipment?	1/		
đ.	operating and structural equipment?	· 		
5.	Does the schedule indicate the frequency of inspection for each item (265.15b.4)?	. <u>/</u>		
5.	Does the schedule include daily inspections of loading and unloading areas (265.15b.4)?			MA
7.	Has the facility taken remedial action to correct the problems revealed on an inspection (265.15c)?			
		<del></del>		

# III. General Facility Standards: - Continued (Part 265 Subpart B)

		Yes	No	Comments
8.	Are inspections recorded in an inspection log (265.15d)?	_		
9.	Does the log include: (265.15d)			
a.	Date and time of inspection?			
b.	Name of inspector?	<u>/</u>		
c.	Observations recorded?			•
đ.	Date and nature of repairs or other remedial actions?	_		· ,
10.	Are inspection records kept for at least 3 years (265.15d)?			.*
E)	Personnel Training:			
1.	Does the facility have a personnel training program (265.16a.1)?	$\frac{}{}$		
2.	Is it directed by a person trained in H.W. management procedures (265.16a.2)?	_		
3.	Does the program include training in: (265.16a.3)			
a.	Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment?	<u>.</u>	· :	
b.	Emergency procedures including contingency plan implementation?	<u></u>		
4.	Do new personnel receive required training within 6 months (265.16b)?	·. <u>√</u>	•	
5.	Do personnel take part in an annual review of the initial training (265.16c)?	$\underline{\mathcal{J}}$		

## III. General Facility Standards: - Continued (Part 265 Subpart B)

	·	Yes	No_	Comments
6.	Do personnel training records include: (265.16d)			•
a.	Job titles?			
b.	Job Descriptions?		_	
c.	Descriptions of training?	6		
b.	Records of training?	<u>/</u>		
(F)	Requirements For Ignitable, Reactive Or Incompatible Wastes:			
1.	Are the following precautions taken to prevent accidental ignition or reaction: (265.17a)		• ·	
a.	Separation and protection from ignition sources?	<u> </u>	·——	
b.	No smoking signs in hazard areas?	/		
2.	Is the T/S/D of ignitable, reactive and incompatible waste conducted so that it does not: (265.17b)			
a.	Generate extreme heat or pressure, fire or explosion, or violent reaction?	<u>/</u>	. <u>.</u>	
ь.	Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?	<u>~</u>		
C.	Damage structural integrity of H.W. containment devices? (e.g., tanks, containers, liners)			
đ.	Threaten human health or the			•

#### IV. Preparedness and Prevention: (Part 265 Subpart C)

		Yes	No	Comments	
(A)	Is the facility designed, constructed, maintained, and operated to minimize the possibility of fire, explosion, or releases of H.W. or H.W. constituents to air, soil, or surface water which could threaten human health or the environment (265.31)?	<u>/</u>		including	CAPs.
(B)	Required Equipment:				
1.	Does the facility have the following equipment where applicable:				
a.	Internal communications or alarm systems (265.32a)?	<u>/</u> .	-	.0	
b.	Telephone or 2-way radios at the scene of operation (265.32b)?	<u>/</u> .	-		
c.	Portable fire extinguishers with water, foam, inert gas, dry chemical spill control and decontamination equipment (265.32c)?				•
d.	Water at adequate volume and pressure or foam producing equipment or automatic sprinklers (265.32d)?				
(C)	Testing And Maintenance Of Equipment		•		
1.	Does the facility test and maintain . emergency equipment in operable condition (265.33)?	<u></u>			
(D)	Access To Communications Or Alarm Sys	st <b>ems</b> :			
1.	Do personnel in areas where H.W. isbeing handled have immediate access to these systems (265.34)?	V			
(E)	Required Aisle Space:				
1.	Is their adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency (265.35)?	<u>/</u>			

## IV. Preparedness and Prevention: - Continued (Part 265 Subpart C)

		Yes	No_	Comments
F)	Arrangements With Local Authorities:			
1.	Has the facility made the following arrangements:			à
a.	Arrangements to familiarize police, fire dept., and emergency response team with H.W. operations (265.37a.1)?	<u>/</u>		
b.	Agreements designating primary emergency authority (265.37a.2)?	1/		<del></del>
c.	Agreements with State emergency response teams, contractors and equipment suppliers (265.37a.3)?	<u>/</u> .	-	,
đ.	Arrangements to familiarize local hospitals with the properties of H.W. and the types of potential injuries and illnesses from exposure to H.W. (265.37a.4)?			
2. ·	Did the facility document in the operating record any refusal by State or local authorities to enter into such arrangements (265.37b)?		<u>/</u>	· NIA

# V. Contingency Plan and Emergency Procedures: (Part 265 Subpart D)

		<u>Yes</u>	No	Comments
(A)	Does the facility have a contingency plan (265.51a)?	<u>/</u>		. ·
(B)	Content Of Contingency Plan:			
1:	Does the plan describe actions personnel must take to comply with \$\$ 265.51 & 265.56 in response to fires, explosions, or unplanned releases of H.W. (265.52a)?	<u> </u>	_	
2.	Does the plan describe arrangements agreed by police, fire dept., hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to § 265.37 (265.52c)?	<u>/</u> ·		,¢
3.	Does the Plan list names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators (265.52d)? (list in order of responsibility)	<u>√</u>		no Lone address
4.	Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability (265.52e)?	<u>/</u>		
5.	Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes (265.52f)?	<u>~</u>	•	·
(C)	Copies of Contingency Plan:			•
1.	Is the plan maintained at the facility (265.53a)?	V		
2.	Has the plan been submitted to all local emergency organizations (265.53b)?	<b>√</b>		On base hors; tal FD

# V. Contingency Plan and Emergency Procedures: - Con't. (Part 265 Subpart D)

	Yes	NO	Comments
Amendment Of Contingency Plan:			
Has the plan been reviewed and immediately amended when required (265.54)?	****	V	Plan new initiated
Emergency Coordinator:			
Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)?	/		
Does the coordinator have authority to carry out the contingency plan (265.55)?	<u>/</u>	•	
Emergency Procedures:			. <b>4</b> 4
If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in § 265.56 (265.56)?			N/A. Emegany s. hahre.
	Emergency Coordinator:  Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)?  Does the coordinator have authority to carry out the contingency plan (265.55)?  Emergency Procedures:  If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures	Has the plan been reviewed and immediately amended when required (265.54)?  Emergency Coordinator:  Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)?  Does the coordinator have authority to carry out the contingency plan (265.55)?  Emergency Procedures:  If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures	Amendment Of Contingency Plan:  Has the plan been reviewed and immediately amended when required (265.54)?  Emergency Coordinator:  Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)?  Does the coordinator have authority to carry out the contingency plan (265.55)?  Emergency Procedures:  If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures

## VI. Manifest System, Recordkeeping, and Reporting: (Part 265 Subpart E)

		<u>Yes</u>	No_	Coments
(A)	Use of Manifest System:			
1.	Does the facility comply with the following manifest requirements:			•
a.	Sign and date each copy of the manifest (265.71a.1)?	_/		
b.	Note any significant * discrepancies in the manifest (265.71a.2)?			
c.	Give transporter one copy of the signed manifest (265.71a.3)?	<u>/</u>		
	Within 30 days after delivery, send a copy of the manifest to the generator (265.71a.4)?			NA
	Are records of past shipments retained for 3 years (265.71a.5)?	<u>/</u> .		• •
(B)	Manifest Discrepancies:			•
1.	Upon discovering a significant discrepancy, has the facility made an attempt to reconcile the discrepancy with the generator or transporter (265.72b)?	<u> </u>	_	
2.	For discrepancies not reconciled within 15 days, has the facility followed the required reporting procedures (265.72b)?	/		
(C)	Operating Record:			
	Does the facility maintain an operating record (265.73a)?	<u> </u>	_	

- \* Significant discrepancies are:
  1. For bulk waste; variations > 10% in weight
  2. For containerized waste; variations > one drum
  - 3. Obvious differences such as waste solvent substituted for waste acid

# VI. Manifest System, Recordkeeping, and Reporting: - Con't (Part 265 Subpart E)

		Yes	<u>No</u>	Comments
2.	Does the operating record contain the following information:			ı
ě	a. A description and the quantity of each waste received (265.73b.1)?	/		
t	treatment, storage or disposal as required by Appendix I (265.73b.1)?		_	
c	The location of each waste within the facility and the quantity at each location (265.73b.2)? (This information must include cross-references to specific	_		•
	manifest numbers.)		•	•
. d	For disposal facilities, the location and quantity of each waste is recorded on a map or diagram of each cell or disposal area (265.73b.2)?			A16
•	Records and results of all waste analysis and trial tests (265.73b.3)?			•
f.	Reports detailing all incidents that required implementation of the contingency plan (265.73b.4)?			· NIA ·
g.	Records and results of operator inspections (265.73b.5)?	<u>/</u>	· :	
h.	Monitoring data (265.73b.6)?	•		NA
i.	All closure and post-closure costs as applicable (265.73b.7)?			NA
(D)	Availability, Retention, Disposition Of Records:			
1.	Are all records including plans available for inspection (265.74a)?	/		
2.	Have copies of records of H.W. disposal locations and quantities under \$ 265.73b.2 been submitted to the RA and local land authority upon closure of the facility (265.74c)?			N.A
			<del></del> -	

# VI. Manifest System, Recordkeeping, and Reporting: - Con't. (Part 265 Subpart E)

		Yes	No	Comments
(E)	Biennial Report:			
1.	Has the facility submitted a biennial report to the RA by March 1 of each even numbered year (265.75)?	<u>/</u>		+ CA, DOHS annual report.
2.	Was the report submitted on EPA form 8700-13B and cover facility activities during the previous calendar year ( 265.75)?	<u>"</u>		
3.	Does the report include the following infromation: (265.75)			3
a.	EPA identification number, name and address of the facility?	<u>/</u> .	•	.•
b.	Calendar year covered by report?	<u>/</u> .		•
c.	For off-site facilities, the EPA identification number of each generator?			w A
đ.	Description and quantity of each H.W. received and, for off-site facilities, the EPA identification number of each generator listed with this information?	_/		
e.	Methods of treatment, storage, or disposal for each H.W.?		-	
f.	Monitoring data under \$ 265.94a.2.ii and iii and b.2 ?			WIA
g.	Most recent closure and post-closure cost estimates?			NA
h.	Required certification?			NA

# VI. Manifest System, Recordkeeping, and Reporting: - Con't (Part 265 Subpart E)

		Yes	<u>No</u>	Comments	
(F)	Unmanifested Waste Report:				
1.	For a facility that has accepted a H.W. from an off-site source without an accompanying manifest, was a report containing the required information submitted to the RA within 15 days after receiving the H.W. (265.76a-g)?		_	MA	
(G)	Additional Reports:				
1.	Has the facility reported to the RA: (265.77)			١	
a.	Releases, fires and explosions?			none occurred	
b.	Ground-water contamination and monitoring data?	•		NA	
c.	Facility closure?	.*		NIA	

# VIII. Closure and Post-Closure: (Part 265 Subpart G)

			Yes	<u>No</u>	Comments
and the state of t	(A)	Closure Plan:			<b>:</b>
Section appears to the contraction	1.	Does the facility have a closure plan (265.112a)?	/		
grade management and a grade production of the contract of the	2.	Does the plan identify the steps necessary to completely or partially close the facility at any point during its intended operating life and to completely close at the end of its intended operating life (265.112a)?	<b></b>		
Description of the second	3.	Do the steps to close in the plan include: (265.112a)			
and a colorest	a.	Pre-treatment of H.W.?			NA
and the state of	b.	Treatment of H.W.?			WIA
A Magain Transmitter	c.	Removal of H.W. from process units?	$\checkmark$		comotal from GAP.
ř	d.	Disposal of H.W.?	1		
A Thomas Annual Control	e.	Decontamination of equipment and structures?	_		
Agentin and the second	f.	Scheduled inspections for closure certification purposes?	V		•
State of the special state of the state of t	•	Does the description of how and when the facility will be closed include the following elements:			
,		Maximum extent of operation which will be unclosed during the life of the facility (265.112a.1)?	<u> </u>		
MALE CONTRACTOR AND		For facilities that have designated H.W. management areas inactive prior to Nov. 19, 1980, are records available documenting the cessation of activity or final closure?			MA
		Was a Notification of Hazardous Waste Site submitted to EPA as required by § 103c of CERCLA ?	<u>/</u>		
:					

## VIII. Closure and Post-Closure: - Continued (Part 265 Subpart G)

		Yes	No_	Connents
b.	Estimate of the maximum inventory of H.W. in storage and in treatment at any time during the life of the facility (265.112a.2)?	/		
c.	Does the inventory include the maximum amount of on-site:			
	H.W. in surface impoundments?			MA
	H.W. in tanks?			U/A
	H.W. in piles?			N/A
	H.W. in containers?	/		
	H.W. in drainage pits or sumps?			~ /A
	Contaminated soil from spills or leaks?	•		_NA'
	Contaminated soils and liners from non-disposal impoundments?			MA
•	Contaminated soils from land treatment fields?			r 1A
	Decontamination residues?			MA
	Process residues?		<del></del>	NIA
	Other (specify)?		·	
d.	Decontamination procedures including: (265.112a.3)	•		
	A list of equipment, containers, structures requiring decontamination?	/		
	Sampling and analytical methods for determining whether soil contamination or decontamination residues are H.W.?		_	NA
	Testing criteria for determining adequacy of clean-up?	_		NA.
	Methods of treatment or disposal of contaminated soils and residues?	_		
		_20_		

#### VIII. Closure and Post-Closure: - Continued (Part 265 Subpart G)

		Yes	No	Comments
e.	Estimate of the expected year of closure (265.112a.4)?			· MA
f.	Schedule for final closure activities (265.112a.4)?	_/		
g.	Does the schedule include:	,		
	Total time required to close?		_	
	Time required for intervening closure activities?	/		
	(e.g., Time required for H.W. treat- ment, disposal, decontamination, and certification inspections.)		,	
4.	Has the facility amended the plan whenever changes in operating practice or process design affect the plan or there is a change in the expected year of closure (265.112b)? (Plan must be amended within 60 days			MIA
5.	of the changes.) Has the facility submitted a closure			
	plan to the RA at least 180 days before the date they expect to begin closure (265.112c)?			· MA ·
(B)	Time Allowed For Closure:		•	
1.	Does the schedule for final closure allow for the following:			
a.	Treatment, removal, or disposal of H.W. within 90 days after receipt of final volume of H.W. or after approval of closure plan (265.113a)?	. <u> </u>		•
b.	Completion of closure plan activities within 180 days after receipt of final volume of H.W. or after approval of closure plan (265.113b)?	<u> </u>		

#### VIII. <u>Closure and Post-Closure</u>: - Continued (Part 265 Subpart G)

		Yes	<u>No</u>	Comments
(C)	Disposal And Decontamination Of Equipment:			
1.	For facilities that have completed closure activities, has all equipment and structures been properly disposed of or decontaminated by removing all H.W. and contaminated residues (265.114)?			NIA
(D)	Certification Of Closure:			
1.	For facilities that have completed closure activities, has a certification by owner/operator and an independent registered professional engineer been submitted to the RA (265.115)?	_		· NIA
(E)	Partial Closure:			
, 1.	Does the facility plan to close discreet regulated H.W. manage-units during the intended operating life?			NA
	If "Yes" complete compliance form for partial closure.			

# VIII. Closure and Post-Closure: - Continued (Part 265 Subpart G)

#### Compliance Form For Partial Closure

		Yes	No_	Comments
(E)	Partial Closure:			
1.	Does the closure plan describe how the facility will be partially closed (265,112a,1)?			N/A
2.	Does the plan describe the size of areas partially closed?			
3.	Does the plan describe the procedures for partial closure?			
4.	Does the plan address maintenance activities, including: (265.112a.1)		•	.•
b. c. d. e. f. g. h. i.	Visual inspections? Ground-water monitoring? Maintaining cover? Maintaining diversion structures? Controlling erosion? Maintaining vegetation? Maintaining site security systems? Leachate collection system? Gas collection system? Other (specify)?			
5.	Does the plan describe the frequencies for each type of maintenance activity (265.112a.1)?		<u>:</u>	
6.	Does the plan describe when the facility will be partially closed (265.112a.1)?			
7.	Does the schedule for partial closure include: (265.112a.1)	•		
b.	Date(s) of partial closure(s)? Total time required for each partial closure? Time required for intervening partial closure activities? (e.g., time required for waste removal, stabilization, treatment, disposal; placement of cover; vegetation; decontamination; certifications			

#### VIII. <u>Closure and Post-Closure</u>: - Continued (Part 265 Subpart G)

		<u>Yes</u>	NO_	Comments
(F)	Post-Closure:			
1.	Does the facility have a post- closure plan (265.118a)?			N/A.
2.	Does the plan cover the maximum area expected to contain H.W. after closure, including: (265.118a)	l		
b. c.	Landfills? Disposal surface impoundments? Land treatment facilities where H.W. will remain?		_	
đ.	Other remaining H.W. (specify)?			<b>3</b>
3.	Does the plan cover all areas where H.W. will remain that were active as of Nov. 19, 1980 (265.118a)?			.•
4.	Does the plan provide for 30 years of post-closure care (265.117a)?			
5.	Does the plan clearly identify the activities required in post-closure care (265.118a)?	-11		·
6.	Does the plan clearly identify the frequencies for post-closure care activities (265.118a)?			
7.	Does the plan describe ground-water monitoring, including: (265.118a.1)		•	
a. b.	Number of wells? Sample collection activities and			
	frequencies? Sample testing procedures and frequencies?			
đ.	Replacement of failed wells?			

#### VIII. <u>Closure and Post-Closure</u>: - Continued (Part 265 Subpart G)

		Yes	<u>No</u>	Comments
8.	Does the plan describe maintenance for waste containment structures, including the types of activities and frequency of activities necess- ary to maintain: (265.118a.2)			,
b. c. d. e. f.	Site security systems? Surveyed benchmarks? Facility monitoring systems? Final cover (erosion damage repair)? Vegetation (fertilizing and mowing)? Runoff collection and treatment systems? Runon control systems? Leachate collection, removal and treatment systems?			N/ A
	Gas collection and treatment systems? Other (specify)?		<u></u>	•
9.	Does the plan identify the name, address and phone number of the post-closure period contact (265.118a.3)?			
10.	Did the facility amend the plan when ever changes in operating practices, or process design, or events which occur during the active life of the facility, affect their post-closure plan (265.118b)? (Plan must be amended within 60 days after the changes or events occur.)		: -	
11.	Did the facility submit their post- closure plan to the RA at least 180 days before they expect to begin closure (265.118c)?			
12.	Did the facility amend the plan whenever changes in monitoring or maintenance plans or events which occur during the post-closure care period affect their post-closure plan (265.118e)? (Facility must petition RA to amend plan in accordance with procedures specified in § 265.118f.)			

#### VIII. Closure and Post-Closure: - Continued (Part 265 Subpart G)

		Yes	<u>No</u>	Comments
(G)	Notice To Local Land Authority:			•
1.	For disposal facilities, were the following documents submitted to the RA and local land authority within 90 days after closure was completed: (265.119)			
a.	A survey plat indicating the locations and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks?			. N/A
b.	A record of the type, location, and quantity of H.W. disposed of within each cell or area of the facility?			
c.	A record of the type, location, and quantity of the wastes disposed of before Nov. 19, 1980?			·
(H)	Notice In Deed To Property:			
1.	For disposal facilities, did the owner of the property record in the deed a notation that will in perpetuity notify any potential purchaser of the property that the land was used to manage H.W. and its use is restricted under \$ 265.117c (265.120)?		:	

## X. <u>Use And Management Of Containers:</u> (Part 265 Subpart I)

		Yes	<u>No</u>	Comments
1.	Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition (265.171)?	· /		3
2.	Are containers compatible with H.W. stored in them (265,172)?	1/	*****	
3.	Are containers stored closed (265,173a)?	1/		
4.	Are containers managed to prevent rupture or leakage (265,173b)?	<u>/</u>	_	
5.	Are containers inspected weekly for leaks and deterioration (265.174)?	V		
6.	Are ignitable or reactive wastes stored at least 50 feet from the facility's property line (265.176)?	<u>'</u>		.•
7.	Are incompatible wastes stored in separate containers (265.177a)?			
8.	Are H.W. not placed in unwashed containers that previously held an incompatible waste or material (265.177b)?	<u> </u>		
9.	Are containers holding a H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by suffecient distance or protected by means of a dike, berm, wall, or other device (265.177c)?	· ·	•	
10.	Are containers that are not empty managed as a H.W. (261.7a.2)?	<u>/</u> .		
11.	For a container to be considered empty the facility must ensure that:			
	No more than one inch of residue remains on bottom of container or inner lining (261.7b.1)? Containers that held an acutely H.W.	<u> </u>	<del></del>	
	are tripled rinsed using a solvent capable of removing the contents (261.7b.3)?		<u>~</u> .	Disposed of as HW.

#### XI. <u>Tanks</u>: (Part 265 Subpart J)

		Yes	No_	Comments
1.	Is the treatment or storage of H.W. in tanks conducted so that it does not: (265.192a)			,
ā.	Generate extreme heat or pressure; fire or explosion; or violent reaction?			NIA
b.	Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases?			
c.	Damage the structural integrity of the tank?	_		
<b>2.</b>	Are H.W. or treatment reagents placed in a tank so that they do not cause the tank or its inner liner to rupt- ure, leak, corrode, or otherwise fail (265.192b)?			.•
3.	Do uncovered tanks have at least 2 feet of freeboard, or dikes, or other containment features (265.192c)?			·
4.	Where H.W. is continuously fed into a tank, is the tank equipped with a waste feed cutoff system or by-pass system to a stand-by tank (265.192d)?			
5.	Does the facility conduct waste analysis and trial treatment or storage tests, or have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions before the tank is used to:		•	
a.	Chemically treat or store a H.W. which is substantially different from waste previously treated or stored in the tank (265.193a.1)?			
b.	Chemically treat H.W. with a substantially different process than was previously used (265.193a.2)?	—	_	

#### XI. <u>Tanks</u>: - Continued (Part 265 Subpart J)

		Yes	No	Comments
6.	Are daily and weekly inspections done for the following:			
a.	Discharge control equipment e.g., feed cutoff, bypass and drainage systems (Daily) (265.194a.1)?			NA
b.	Data gathered from monitoring equipment e.g., pressure and temperature gauges (Daily) (265.194a.2)?			
c.	Level of waste in uncovered tanks (Daily) (265.194a.3)?			
đ.	Construction materials of tank e.g., corrosion, leaking fixtures or seams (Weekly) (265.194a.4)?			
0.	Discharge confinement structures e.g., dikes (Weekly) (265.194a.5)?		· <u> </u>	,
7.	At closure, are all H.W. and residues removed from tanks and associated equipment and structures (265.197)?	·.		
8.	Are ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity (265.198a.1)?			
9.	Are ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react (265.198a.2)?			
10.	Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981) (265.198b)?			
11.	Are incompatible wastes stored in separate tanks (265.199a)?			
12.	Are H.W. not placed in unwashed tanks that previously held an incompatible waste or material (265.199b)?			

#### XIII. Waste Piles: (Part 265 Subpart L)

		Yes	No_	Comments
1.	Are waste piles covered or protected from dispersal by wind (265.251)?			N/A
2.	Is a representative sample of waste from each incoming movement analyzed to determine its compatibility with other waste in the pile (265.252)?			
3.	For waste piles where the leachate or run-off from the pile is a H.W.:			
a.	Is the pile placed on an impermeable base that is compatible with the waste; run-on is diverted away from the pile; leachate and run-off is collected and managed as a H.W. (265,253a)? -or-		·	,
b.	The pile is protected from precipitat	<b>-</b> .		•
' c.	ion and run-on (265.253b.1)? -and- No liquids or wastes containing free liquids are placed in the pile (265.253b.2)?			
4.	For facilities that add ignitable or reactive wastes to an existing pile, can the following be demonstrated:			
a.	The resulting waste mixture no longer meets the definition of ignitable or reactive waste and the mixing will not cause an uncontrolled reaction (265.256a.1)?			
b.	The waste is protected from materials or conditions that might cause them to ignite or react (265.256a.2)?			
5.	Does the facility take precautions to ensure that incompatible wastes and materials are not placed in the same waste pile (265.257a)?	·		·
6.	Are piles of H.W. that are incompatible with materials stored nearby separated by suffecient distance or protected by some structural device e.g., dike, wall or berm (265.257b)?			
7.	Are H.W. not placed on the same area where incompatible wastes were previously piled (265.257c)?			

ATTACHMENT I

**HSWA REQUIREMENTS** 

#### HSWA Requirements

		<u>1125 NO</u>	COMPAIS
Und	erground Tanks		
1.	If an underground product storage tank has been installe since May 7, 1985, does it comply with the following standard	n- rds:	~ / A
	a. Will it prevent releases of to corrosion or structural failure for the operational life of the tank (280.2(a)(1))?		
	b. Is it cathodically pro- tected against corrosion, constructed of non- corrosive material, or designed in a manner to prevent the release or threatened release of any stored substance (280.2(a)	(2))?	
•	c. Is it constructed or lined with material that is compatible with the substance to be stored (280.2(a)(3))		
2.	Did the facility notify the State (or EPA if on Indian lands) by May 8, 1986, of any tank(s) in the ground as of		

#### HSWA Requirements

		YES	<u>NO</u>	COMMENTS
Part	266, Subparts D and E			
<u>P</u>	rohibitions		,	
1.	Are mixtures of hazardous waste and used oil used for dust suppression (266.23)?	***************************************	<u> </u>	
2.	Is any hazardous waste fuel or off-specification used oil fuel burned in restricted (non-industrial) boilers or furnances (266.31(b) and 266.41(b))?		<u> </u>	
3.	If the facility is a coment kiln located within the boundaries of a munici- pality of population greater than 500,000, and is not operating as a RCRA incinerator, are they burning hazardous waste fuel (266.31)?		· .	· ~ /A
<u>N</u> k	<u>ptification</u>		•	
1.	Is the facility engaged in any of the following activities with respect to either used oil fuel or hazardous waste fuel 266.34 and 266.43:			
	<ul><li>a. marketing?</li><li>b. processing?</li><li>c. burning?</li></ul>			
•	If not, Part 266, Subparts D & E	do not	apply.	
2.	If so, has the facility notified EPA of those waste-as-fuel activities (in addition to their original notification (266.34(b), 266.35, 266.43(b), and 266.44)?			

•			1123	140	CAPTENIS	
	ha st Pa	the facility handles zardous waste fuel, is it ored in compliance with rt 265 (266.34(c))?				
	A.  1. If ma us th in	Used Oil Fuel (UOF):  the facility is the first rketer to claim that the ed oil fuel meets all e specifications listed 266.40(e), do they have				· · · · · · · · · · · · · · · · · · ·
	ot to (2 sp ef	cords of the analyses (or her adequate information) document that claim 66.43(b)(6))? (Lead ecification is not fective until 5/29/86)				
	00 pr wi (1 (2	es all off-specification  F meet the rebuttable  esumption of mixing  th hazardous waste ,000 ppm total halogen)  66.40(c))?				1 1 10 10
	ha ha	not, the fuel is considered a zardous waste fuel and must be ndled as such. (See (B) below)	•			
	of sh (2	es the facility have copies invoices for all off-spec. UOB imments sent or received 66.43(b)(6) and 266.44(e)? frective 3/31/86)				
		•				•
-		•				٠

COMMENTS M YES If the facility markets to a burner, or is itself a burner, do they have on record a copy of the burner's certification that they have notified EPA of waste-asfuel activities and will only burn in unrestricted boilers or furnaces (i.e., industrial boilers and furnaces burning to recover useful heat energy, as specified in 261.41(b)), (266.43(b)(6) and 266.44(e))? (Effective 3/31/86) Hazardous Waste Fuel (HWF): В. Does the facility have records of manifests for all shipments of hazardous waste fuel sent out or received (262.40, 264.71(a), and 265.71(a))? (Effective 3/31/86) If the facility markets to a burner or is itself a burner, is there, on record, a copy of the burner's certification that they have notified EPA of waste-as-fuel activities and will only burn in unrestricted boilers and furnaces (i.e., industrial boilers and furnances burning to recover useful energy, as specified in 266.31(b)), (266.34(f) and 266.35(e))?

#### HSWA Requirements

## Corrective Action Program Dévelopment

			YES	<u>NO</u>	COMPNIS
1.	Ass.	s the facility have SWMU's? ign each yes response a consec per. Describe unit in comment	cutive s sect	ion.	· :
	1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15.	Landfill Surface Impoundment Land Farm Waste Pile Incinerator Storage Tank (above ground) Storage Tank (below ground) Container Storage Area Injection Wells Wastewater Treatment Units Transfer Stations Loading/Unloading Areas Waste Recycling Operations Waste Treatment Units Waste Detoxification Units Others		I KAKAKA KAKAKA	
2.		there any indication of a posseps, discolored soil, stressed			etc)
		SWMU 1 SWMU 2 SWMU 3 SWMU 4 SWMU 5 SWMU 6 SWMU 7			
3.	OF I	e any monitoring, sampling, cl mitigation efforts occured at sch copies of reports and data	any of	activiti the SW	les fü¹s?
•	1. 2. 3. 4. 5. 6.	SMU 1 SMU 2 SMU 3 SMU 4 - SMU 5 SMU 6 SMU 7			N/A

# DRAFT RCRA F-SOLVENT LAND RESTRICTION

Inspector	Name
Address	
Tel. No.	<del></del>

## TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

1.	FACILITY IDENTIFICATIO	N					
	Van der berg Facility Name of	AFR					
Α.	Facility Name o			в.	Street (d	or other ide	ntifier
	1 22 20	(1					
c.	City	D- St	ata	<u> 75</u>	UST Zip Code	Danta 1	ریے مار <sup>س</sup> ے کے
					arb code	#. ·	county N
_	Nature of business; ic	Boy De_					
Ģ.	Nature of business; 10	dentification o	of operati	ons			
	CA 9 570025 EPA ID #	149					
н.	EPA ID #				· · · · · · · · · · · · · · · · · · ·	·	<del></del>
T.	Lt. Col. James Facility Contact (Name	Morris	(	(805) (	866-90	687	
	vacinty contact (name	s arm sticing will	Der j				ments
II.A.	For on-site facilit	ies, complete	the gener	ator che	cklist	CO	merics.
в.	General Facility St	andards			· · · · · ·		
1.	Was waste analysis pl						
	properly to cover Par			إس	aste imely	ni methods	not-
	requirements [§264.13	or 265.13]?	Yes	<u>√ No</u> 5 €	cufes	in write and contic	elyns
2.	Did facility obtain r	epresentative		مین از	wation ,	er consulta	マトナン・ラト
	chemical and physical	analysis of		•	•		
	waste(s) and residues	?	<u> </u> ✓Yes	<b>No</b> t	or Untrage	of constitu	دسل
	a. Did testing includ	e analyses for				•	
	all F001-F005 cons		Yes	No			
	h Dage englished and			<del></del>			
	b. Were analyses perf using TCLP?	ormed	Yes	Via			
	4021.19 10.E.			V NO			
	c. Were analyses cond			,			
	offsite (identify	offsite lab)?	on _	<u></u> _∕off:_			
	d. Describe frequency	of sampling:	2 00	it of	8 2	i	
	e. Describe procedure	s used to					
	identify manifest	discrepancies _	~/	A			
2	Ava the imple and in-	<b>1</b> ·					
٥.	Are the waste analysi: [§264.13/265.13]?	s braus accepts	ible Yes i	No			
4.	Are the operating reco	ords, including	j				
	analyses and quantitie [§264.73/265.73]?	ss, complete	/	<b></b>			
	L 34071/4031/3] {		√ Yes	No			

	Facility: VAY 15
	ID Number: CA 4570125149
	Inspector:
	Date:
<u>Storage</u> (§268.50)	Comments
1. a. Were F001-F005 wastes exceeding treatment	
standards stored?	YesNo
If no, go to "C"	
b. Are all containers and tanks clearly marked to identify contents and date(s) entering storage?	Yes No
c. Do operating records track the location, quantity and dates wastes exceeding treatment standards entered and were removed	
from storage?	Yes No
d. Do operating records agree with container/tank labeling?	Yes No
e. Is waste exceeding treatment standards stored for less than 1 year?	Yes Mo
If yes, can you show that such accumulation is <u>not</u> necessary to facilitate proper recovery treatment or disposal?	Yes No
If yes, state how:	·
f. Were tanks emptied and containers sent for treatment at least once per year, and do operating record show that the volume of waste removed from tanks annually at least equals tank volume?	
g. Was/is waste exceeding treatment standards stored for more than one year?	Yes/ No

в.

		Facility: VAFB ID Number: CA 45 7 0025 149 Inspector: Date:	
	If yes, state the owner/operators' proof that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal:	Comments	144
	h. Are F-solvent wastes exceeding treatment standards "stored" in surface impoundments?	Yes	
c.	Treatment in Surface Impoundments (§268.	.4)	
1.	Were F001-F005 wastes exceeding treatment standards placed in surface impoundments for treatment?	Yes No	
	If no, go to "D"		
2.	Does the facility have acceptable evidence that treatment occurs in the impoundment?  If yes, note the evidence	YesNo	
3.	Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably and in accordance with the sampling frequency and analysis specified in the waste analysis plan, and are the results in the operating record?	Yes No	
4.	Did the hazardous waste residue (sludge or liquid) exceed the treatment standards specified in §268.41?	_Yes No	
5.	Provide the frequency of analyses conducted on treatment residues:		
6.	Have the hazardous waste residues that exceed the treatment standards (§268.41) been removed adequately, and on an annual basis?	Yes No DNA	
	<del></del>	Control	<u>ents</u>

	Facility: VAFB ID Number: <u>aa 457 ao 2</u> 5143 Inspector: Date:
(a) If answer to 6 is no and supernatant is determined to exceed treatment concen- trations, is annual throughput greater than impoundment volume?	YesNo
7. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed?	YesNo
8. When removed, were solvent wastes managed subsequently in another surface impoundment?	YesNo
9. When removed, were wastes treated prior to disposal?	YesNo
<ul><li>(a) If yes, are waste residues treated on-site or off-site:</li><li>(b) Identify management method:</li></ul>	odOnsiteOffsite
10. Is the information on Nos. 3-9 above adequately documented in the waste analysis plan and operating record?	
11. Have the minimum technology requirements (§264.221 or 265.221) been met	
If the minimum technology requirement have not been met, has a waiver (268 been granted for that unit(s)?	
12. Have the Subpart F ground-water monitoring requirements been met?	YesNo
13. Did the facility submit a certification of compliance with minimum technology and groundwater monitoring requirements, and the waste analysis plan to the Agency?	YesNo

Comments

			Facility: VAFB ID Number: CA 153 2025149 Inspector: Date:
D.	Treatment		
1	Did the facility operate treatment facilities for F-solvent waste (not including surface impoundments)?	Yes No	
	If no, go to "E"		
2	Describe the treatment processes for F-solvent wastes:		
3.	Does the facility, in accordance		
	with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the F-solvent wastes are less than treatment standards [§268.7(b)]?	Yes No	
4.	Describe frequency of testing of treatment residuals.		
5.	Was dilution used as a substitute for treatment?	_YesNo	
6.	Are certifications and results of wast analyses kept in the operating record?		
7.	Are notices with waste number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment stating that waste has been treated to treatment performance standards [§268.7(b)]?	Yes_No	
8.	Are certifications submitted for each shipment [§268.7(b)]?	YesNo	

Inspector:
Talanhana No:

# DRAFT RCRA LAND RESTRICTION F-SOLVENT GENERATOR CHECKLIST

And and a second	HAND	LER IDENTIFICATION				
reported.	Va	ndenberg AFB Ter Name				
_ <del>A</del> .	Hand	ler Name (		E	. Street (	or other identifier)
A Comment of the Comm	LCV	npoc	CA	934	37 p Code	Santa Bartara
<u>c.</u>	City		D. State	E. Zi	p Code	F. County Name
G.	Natu	r Force Base re of Business; Identif	ication of Oper	ations		
	CA	9570025149				
					\ <del>-1</del>	
	<u> 112. </u>	Col Javies Morr ler Contact (Name and P	ر <u>کار</u> Phone Number)	5)866-96	8 /	
	пани	Ter contact (Name and :	none namoer,			
I.	GEN	ERATOR COMPLIANCE				
Α.	F-Solvent Identification					
Description of the contraction o	1. Does the handler generate the following wastes?					
E-17	a.	F001		✓ YesNo	)	
	b.	F002		√ YesNo	)	
	c.	F003		✓ YesNo	)	
grand and the second se		If an F003 wastestream non-restricted solid of ignitability character	or hazardous was	te, does the	resultant m	en mixed with a nixture exhibit the or not nixed
	d.	F004		✓_YesNo		
department of the control of the con	e.	F005		✓ YesNo	o	
and a	2.	Source of the above: other (specify)	Form 8700-12 _	; Part A	∠; Part B	;
whe the	ther faci	A is intended to assist the facility is general lity previously. If you beled, turn to Appendix	ting F-solvent o ou are concerne	vastes, if such that F-solve	ch wastes w	<b>ere not iden</b> titied by

	I	D Number: _ nspector: _ ate:	
BDA'	T Treatability Group - Treatment Standards Ident	ification	Comment
1.	Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?	_No	
Was	te Analysis		
1.	Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]	:	
	a. Knowledge of wastes Yes	_No	
	b. TCLP Yes $ u$	No	
	c. Other (specify)		
	If knowledge, note how this is adequate:		
	If determined by TCLP, provide date of last tes frequency of testing, and attach test results.  Dates/frequency:		
	Note any problems:		
	d. Were wastes tested using TCLP when a proces wastestream changed?  Yes		
2.	Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]? Yes	_No	
3.	Did the generator dilute the waste or the treat residual so as to substitute for adequate treat [268.3]	ment	
Man	agement		
1.	Onsite management		
	a. Were F-solvent wastes managed onsite?	No	Otanis

Handler Name:

If yes, answer 1(b) and (c); if no, answer 2.

			ID Number:	e:
ъ.	For wastes that exceed treatment treatment, storage, and/or dispos	standard al condu <u>/</u> Yes	cteu:	Storas C
If yes,	TSDF Checklist must be completed.	•		
c.	Are test results maintained in threcord [264.74(b)3/265.73(b)(3)]?	Yes	ing No	
2. Offs	ite Management			
a.	If F-solvent wastes exceed treated did generator provide treatment [268.7(a)(1)]:	ment star facility	ndards,	
(i)	EPA waste number?	<u></u> ∕Yes	No	·
(ii)	Applicable treatment standard?	Yes	No	
(iii	.) Manifest number?	Yes	No	
(iv)	Waste analysis data, if availa	ble? Yes	No	
Identify	offsite treatment facilities			
ъ.	If F-solvent wastes did not exce standards, did generator provide facility [268.7(a)(2)]:	ed treat	ment	NA
(i)	EPA Hazardous waste number?	Yes	No	
(ii)	) Applicable treatment standard?	Yes	No	
(ii:	i) Manifest number?	Yes	No	
(iv	) Waste analysis data, if availa	ble? Yes	No	
(v)	Certification that waste meets treatment standards?	Yes	No	
Identif certifi	y land disposal facilities received wastes	ing the	BDAT	

		Handler Nam ID Number: Inspector: Date:	e:
с.	If waste is subject to nationwi [268.30] (e.g., solvent-water m than 1%), case-by-case extension petition [268.6] does generator to disposer that waste is exemply disposal restrictions [268.7(a)]	ixtures less n [268.5] or provide notice t from land	Comment:
Storage	of F-Solvent Waste		
day	F-solvent waste stored for greas (after variance 180/270 days f8.50(a)(1)]?		
	was facility operating as a TSD or final permit?	under interim Yes No	
es, TSDF	Checklist must be completed.		
(i.e.,	nt Using RCRA 264/265 Exempt Uni boilers, furnaces, distillation ter treatment tanks, etc.)		
	eatment residuals generated RA 264/265 exempt units or es?	YesNo	NIA
If yes,	list type of treatment unit and	processes	
idards, ti	uals from a RCRA-exempt treatmen he owner/operator is considered r should determine whether the g identification requirements, hav	a generator of restric enerator requirements,	ted waste. particu-